

May. 3. 2021 11:55AM

No. 0096 P. 3

PETER CHAMAS, ESQ.  
 ATTORNEY ID NO.: 034531990  
 GILL & CHAMAS, LLC  
 655 Florida Grove Road  
 P.O. Box 760  
 Woodbridge, New Jersey 07095  
 (732) 324-7600  
 Attorneys for the plaintiff(s)

DATE: 5/4/21TIME: 3:15 PMID#: 1254INITIALS: SAC

<p>JORGE MARTINEZ and LISSETE MARTINEZ, his wife,</p> <p style="text-align: right;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>SAFARILAND, LLC d/b/a SAFARILAND GROUP, SAFARILAND LTD.; MAUI ACQUISITION CORP.; JOHN DOES 1-10 (said name being fictitious, real names unknown); and ABC CORPS. 1-10 (said name being fictitious, real names unknown)</p> <p style="text-align: right;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY          LAW DIVISION-MIDDLESEX COUNTY</p> <p>DOCKET NO.: MID-L-2596-21</p> <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;"><b>SUMMONS</b></p>
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**SAFARILAND, LLC d/b/a SAFARILAND GROUP**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A filing fee\* payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment

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is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the legal services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated:

5/31/21

Name of Defendant to be Served:  
SAFARILAND LTD.



Clerk, Superior Court of New Jersey

SAFARILAND, LLC d/b/a SAFARILAND GROUP,

Address of Defendant to be Served: 13386 International Parkway, Jacksonville, FL 32218

\$105.00 FOR CHANCERY DIVISION CASES OR \$110.00 FOR LAW DIVISION CASES

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**ATLANTIC COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division, Direct Filing  
1201 Bacharach Blvd. First Fl.  
Atlantic City, NJ 08401  
LAWYER REFERRAL  
(609) 345 3444  
LEGAL SERVICES  
(609) 348 4200

**BERGEN COUNTY**

Deputy Clerk of the Superior Court  
Case Processing Section, Room 119  
Justice Center 10 Main Street  
Hackensack, NJ 07601-0769  
LAWYER REFERRAL  
(201) 488 0044  
LEGAL SERVICES  
(201) 487 2166

**BURLINGTON COUNTY**

Deputy Clerk of the Superior Court  
Central Processing Office  
Attn: Judicial Intake  
First F., Courts Facility  
49 Rancocas Road  
Mt. Holly, NJ 08060  
LAWYER REFERRAL  
(609) 261 4862  
LEGAL SERVICES  
(609) 261 1088

**CAMDEN COUNTY**

Deputy Clerk of the Superior Court  
Civil Processing Office  
1<sup>st</sup> Fl-Hall of Records-101 S. Fifth  
St.  
Camden, NJ 08103  
LAWYER REFERRAL  
(609) 964 4520  
LAWYER REFERRAL  
(609) 964 2010

**CAPE MAY COUNTY**

Deputy Clerk of the Superior Court  
Central Processing Office  
9 N. Main Street Box DN-209  
Cape May Court House, NJ 08210  
LAWYER REFERRAL  
(609) 463 0313  
LEGAL SERVICES  
(609) 465 3001

**CUMBERLAND COUNTY**

Deputy Clerk of the Superior Court  
Civil Case Management Office  
Broad & Fayette Sts., PO Box  
Bridgeton, NJ 08302  
LAWYER REFERRAL  
(609) 692 6207  
LEGAL SERVICES  
(609) 451 0003

**ESSEX COUNTY:**

Deputy Clerk of the Superior Court  
237 Hall of Records  
465 Dr. Martin Luther King, Jr.  
Blvd.  
Newark, NJ 07102  
LAWYER REFERRAL  
(201) 622 6207  
LEGAL SERVICES  
(201) 624 4500

**GLOUCESTER COUNTY**

Deputy Clerk of the Superior Court  
Civil Case Management Office  
Attn: Intake - First Fl. Court House  
1 North Broad Street., PO Box 129  
Woodbury, NJ 08096  
LAWYER REFERRAL  
(609) 848 4589  
LEGAL SERVICES  
(609) 848 5360

**HUDSON COUNTY**

Deputy Clerk of the Superior Court  
Superior Court, Civil Records  
Brennan Court House - 1<sup>st</sup> Floor  
583 Newark Avenue  
Jersey City, NJ 07306  
LAWYER REFERRAL  
(201) 798 2727  
LEGAL SERVICES  
(201) 792 6363

**HUNTERDON COUNTY**

Deputy Clerk of the Superior Court  
Civil Division  
65 Park Avenue  
Flemington, NJ 08862  
LAWYER REFERRAL  
(609) 735 2611  
LEGAL SERVICES  
(609) 782 7979

**MERCER COUNTY**

Deputy Clerk of the Superior Court  
Local Filing Office, Courthouse  
175 South Broad St, PO Box 8068  
Trenton, NJ 08650  
LAWYER REFERRAL  
(609) 585 6200  
LEGAL SERVICES  
(609) 695 6249

**MIDDLESEX COUNTY**

Deputy Clerk of the Superior Court  
Administration Building Third  
Floor  
1 Kennedy Sq., PO Box 2633  
New Brunswick, NJ 08903-2633  
LAWYER REFERRAL  
(908) 828 0053  
LEGAL SERVICES

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(908) 249 7600

**MONMOUTH COUNTY**

Deputy Clerk of the Superior Court  
71 Monument Park PO Box 1262  
Court House, East Wing  
Freehold, NJ 07728  
LAWYER REFERRAL  
(908) 431 5544  
LEGAL SERVICES  
(908) 866 0020

**PASSAIC COUNTY**

Deputy Clerk of the Superior Court  
Civil Division  
Court House 77 Hamilton St.  
Paterson, NJ 07505  
LAWYER REFERRAL  
(201) 278 9223  
LEGAL SERVICES  
(201) 345 7171

**SUSSEX COUNTY**

Deputy Clerk of the Superior Court  
Sussex County Judicial Center  
43-47 High Street  
Newton, NJ 07860  
LAWYER REFERRAL  
(201) 267 5882  
LEGAL SERVICES  
(201) 383 7400

**MORRIS COUNTY**

Deputy Clerk of the Superior Court  
Civil Division  
30 Schuyler Pl. PO Box 910  
Morristown, NJ 07960-0910  
LAWYER REFERRAL  
(201) 267 5882  
LEGAL SERVICES  
(201) 285 6911

**SALEM COUNTY**

Deputy Clerk of the Superior Court  
92 Market St., PO Box 18  
Salem, NJ 08079  
LAWYER REFERRAL  
(609) 678 8363  
LEGAL SERVICES  
(609) 451 0003

**UNION COUNTY**

Deputy Clerk of the Superior Court  
1<sup>ST</sup> Fl. Court House  
2 Broad Street  
Elizabeth, NJ 07207-6073  
LAWYER REFERRAL  
(908) 353 4715  
LEGAL SERVICES  
(908) 354 4340

**OCEAN COUNTY**

Deputy Clerk of the Superior Court  
Court House, Room 119  
18 Washington Street  
Toms River, NJ 08754  
LAWYER REFERRAL  
(908) 240 3666  
LEGAL SERVICES  
(908) 341 2727

**SOMERSET COUNTY**

Deputy Clerk of the Superior Court  
Civil Division Office  
New Court House, 3<sup>rd</sup> Floor  
PO Box 3000  
Somerville, NJ 08876  
LAWYER REFERRAL  
(908) 685 2323  
LEGAL SERVICES  
(908) 231 0840

**WARREN COUNTY**

Deputy Clerk of the Superior Court  
Civil Division Office  
Court House  
Belvidere, NJ 07823-1500  
LAWYER REFERRAL  
(201) 267 5882  
LEGAL SERVICES  
(201) 475 2010

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PETER CHAMAS, ESQ.  
 ATTORNEY ID NO.: 034531990  
 GILL & CHAMAS, LLC  
 655 Florida Grove Road  
 P.O. Box 760  
 Woodbridge, New Jersey 07095  
 (732) 324-7600  
 Attorneys for the plaintiff(s)

<p>JORGE MARTINEZ and LISSETE MARTINEZ, his wife,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>SAFARILAND, LLC d/b/a SAFARILAND GROUP, SAFARILAND LTD.; MAUI ACQUISITION CORP.; JOHN DOES 1-10 (said name being fictitious, real names unknown); and ABC CORPS. 1-10 (said name being fictitious, real names unknown)</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY          LAW DIVISION-MIDDLESEX COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;"><i>Civil Action</i></p> <p style="text-align: center;">COMPLAINT AND JURY DEMAND</p>
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Plaintiffs Jorge Martinez and Lissete Martinez, his wife, residing at 143 Rosewood Lane in the City of Port Reading, County of Middlesex, and State of New Jersey, by way of complaint against the defendants state:

#### **FIRST COUNT**

1. At all times relevant hereto, defendants Safariland, LLC d/b/a Safariland Group, a Limited Liability Corporation and Safariland, Ltd, were authorized to do business in the State of New Jersey, with their principal place of business located at 13386 International Parkway, Jacksonville, Florida 32218.

2. At all times relevant hereto, defendant Maui Acquisition Corp. was authorized to do business in the State of New Jersey, with its principal place of business located at 13386 International Parkway, Jacksonville, Florida 32218.

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3. At all times relevant hereto, defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., were engaged in the business of manufacturing personal and other equipment focused on the law enforcement, public safety, military and recreational markets, including, but not limited to, the Safariland Glock 21 drop holster, model #6305, which Plaintiff, Jorge Martinez, was wearing at the time of the accident.

4. At all times relevant hereto, defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., ABC Corps. 1-10 (said names being fictitious, real names unknown) and John Does 1-10 (said names being fictitious, real names unknown), individually and through their agents, servants and/or employees were engaged in the business of designing, manufacturing, assembling, distributing, marketing, selling, repairing and/or servicing personal and other equipment focused on law enforcement, public safety, military and recreational markets, including, but not limited to, the Safariland Glock 21 drop holster, model #6305, which Plaintiff, Jorge Martinez was wearing, at the time of the incident.

5. On or about May 3, 2019, Plaintiff Jorge Martinez was a Police Officer with the Perth Amboy Police Department and was attending the Special Olympics Law Enforcement Torch Run kick off fundraiser at The Sons of Shillelagh Club located at 815 16<sup>th</sup> Avenue in the Borough of Belmar, County of Monmouth and State of New Jersey.

6. At such time and place, Plaintiff was in uniform which included the Safariland Glock 21 drop holster, model #6305 which held his Glock 21 .45 caliber handgun, as well as his flashlight, when a disabled juvenile attending the fundraiser grabbed plaintiff's gun holster and gun that was secured within the holster.

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7. At such time and place aforesaid, the disabled juvenile's finger entered the holster near the trigger area and discharged the gun while still holstered in the Safariland Glock 21 drop holster model #6305 causing plaintiff to suffer severe and permanent injuries.

8. At all times relevant hereto, the defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., ABC Corps. 1-10 (said names being fictitious, real names unknown) and/or John Does 1-10 (said names being fictitious, real names unknown), introduced into the stream of commerce the subject Safariland Glock 21 drop holster, model #6305, which was not reasonably fit, suitable and/or safe for its intended purpose in violation of the New Jersey Products Liability Act, N.J.S.A. 2A-58(c)-1, *et seq.*, in that it was defectively designed, defectively manufactured, defectively assembled, failed to contain adequate guards, and/or protection and failed to provide adequate warnings thereby allowing the discharge of plaintiff's service weapon while still holstered.

9. At all times relevant hereto and for sometime prior thereto, it was the duty of the defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., ABC Corps. 1-10 (said names being fictitious, real names unknown) and/or John Does 1-10 (said names being fictitious, real names unknown), through their agents, servants and/or employees to properly design, manufacture, construct, assemble, maintain, keep in a safe condition and correct dangerous conditions which constituted a hazard to the lawful users of the subject holster, and to warn the lawful users thereof of unsafe and dangerous conditions associated with the subject holster.

10. As a direct and proximate result of the defective designing, manufacturing, assembling, warning, servicing, distributing, repairing and/or selling by defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., ABC Corps. 1-10



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(said names being fictitious, real names unknown) and/or John Does 1-10 (said names being fictitious, real names unknown), as aforesaid, defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., ABC Corps. 1-10 (said names being fictitious, real names unknown) and/or John Does 1-10 (said names being fictitious, real names unknown), are strictly liable to the plaintiff for the injuries he has suffered.

11. As a direct and proximate result of the actions of the defendants in the placement of the subject Safariland Glock 21 drop holster, model #6305 in the stream of commerce as aforesaid, Plaintiff, Jorge Martinez suffered serious and permanent personal injuries; he has suffered and will in the future suffer great pain; he has been and will in the future be required to expend large sums of money for medical care and treatment of his injuries; he has lost and will in the future lose large sums of money in the form of lost wages; and he has been and will in the future be unable to pursue his normal daily activities as before.

**WHEREFORE** plaintiffs demand judgment against the defendants, either jointly, severally or in the alternative, for damages together with interest and costs of suit.

#### **SECOND COUNT**

1. Plaintiffs repeat and reallege each and every allegation of the First Count and makes the same a part hereof by reference thereto.

2. At the time of its design, manufacture, assembly, distribution, marketing, sale and/or service, defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., ABC Corps., 1-10 (said names being fictitious, real names unknown) and/or John Does 1-10 (said names being fictitious, real names unknown), expressly and impliedly warranted that the subject holster was designed, manufactured, assembled, distributed, marketed, sold and/or serviced in a proper manner complete with adequate and necessary warnings and fit



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for its intended use. As a result, the defendants acted in violation of the New Jersey Product Liability Act, N.J.S.A. 2A:58(c)-1 *et seq.*

3. As a direct and proximate result of the actions of the defendants in the placement of the Safariland Glock 21 drop holster, model #6305 and its components in the stream of commerce as aforesaid, plaintiff, Jorge Martinez suffered serious and permanent personal injuries; he has suffered and will in the future suffer great pain; he has been and will in the future be required to expend large sums of money for medical care and treatment of his injuries; he has lost and will in the future lose large sums of money in the form of lost wages; and he has been and will in the future be unable to pursue his normal daily activities as before.

**WHEREFORE** plaintiffs demand judgment against the defendants, either jointly, severally or in the alternative, for damages together with interest and costs of suit.

### **THIRD COUNT**

1. Plaintiffs repeat and reallege each and every allegation of the First Count and Second Count and makes the same a part herein by reference thereto.

2. At all times relevant herein, defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., ABC Corps., 1-10 (said names being fictitious, real names unknown) and/or John Does 1-10 (said names being fictitious, real names unknown), negligently, carelessly and/or recklessly designed, manufactured, assembled, marketed, distributed and/or sold said holster that was the cause of plaintiff's injuries.

3. As a direct and proximate result of the negligence, carelessness and recklessness of the defendants as aforesaid, plaintiff, Jorge Martinez suffered serious and permanent personal injuries; he has suffered and will in the future suffer great pain; he has been and will in the future be required to expend large sums of money for medical care and treatment of his injuries; he has

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lost and will in the future lose large sums of money in the form of lost wages; and he has been and will in the future be unable to pursue his normal daily activities as before.

**WHEREFORE** plaintiffs demand judgment against the defendants, either jointly, severally or in the alternative, for damages together with interest and costs of suit.

**FOURTH COUNT**

1. Plaintiffs repeat and reallege each and every allegation of the First Count, Second Count and Third Counts and makes same a part hereof by reference thereto.

2. At all relevant times herein, the holster and its components contained defects of which defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., ABC Corps., 1-10 (said names being fictitious, real names unknown) and/or John Does 1-10 (said names being fictitious, real names unknown), and their agents, servants and/or employees had actual or constructive knowledge of the inherent dangerous and defective conditions of said holster and its component parts having created such condition or having observed or been informed of such condition.

3. Despite such knowledge, the defendants placed said holster and its components into the stream of commerce in willful and wanton disregard and reckless indifference to the safety of the product users, consumers and/or others including the plaintiff who foreseeably might be severely harmed by the product.

4. Defendants Safariland, LLC d/b/a Safariland Group, Safariland, Ltd, and Maui Acquisition Corp., ABC Corps., 1-10 (said names being fictitious, real names unknown) and/or John Does 1-10 (said names being fictitious, real names unknown), are liable to the plaintiff for punitive damages pursuant to N.J.S.A. 2A:58C-5, et. seq.

**WHEREFORE** plaintiffs demand judgment against the defendants, either jointly, severally or in the alternative, for damages together with interest and costs of suit.

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**FIFTH COUNT**

1. Plaintiffs repeat and reallege each and every allegation of the First Count, Second Count, Third Count and Fourth Count and makes same a part hereof by reference thereto.

2. At all times relevant hereto, plaintiff, Lissette Martinez was the lawful wife of plaintiff, Jorge Martinez and, as such, is entitled to his services, society and consortium.

3. As a direct and proximate cause of the negligence, carelessness and/or recklessness of the defendants as aforesaid, and the resultant injuries to plaintiff, Jorge, Martinez, plaintiff, Lissette Martinez became deprived of the services, society and consortium of plaintiff, Jose Martinez.

**WHEREFORE** plaintiffs demand judgment against the defendants, either jointly, severally or in the alternative, for damages together with interest and costs of suit.

**JURY DEMAND**

**PLEASE TAKE NOTICE THAT** plaintiff demands a trial by jury as to all issues.

**DEMAND FOR INTERROGATORIES**

**PLEASE TAKE NOTICE** that plaintiffs hereby demand defendant to provide answers to Form C and C(4) Interrogatories within the time prescribed by the Rules of Court.

GILL & CHAMAS, LLC  
Attorneys for Plaintiff



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PETER CHAMAS, ESQ.

Dated: April 30, 2021

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**DESIGNATION OF TRIAL COUNSEL**

**PLEASE TAKE NOTICE THAT** plaintiffs hereby designate Peter Chamas, Esq. as trial counsel for the within matter.

GILL & CHAMAS LLC  
Attorneys for Plaintiff



PETER CHAMAS, ESQ.

Dated: April 30, 2021

**CERTIFICATION PURSUANT TO R. 4:5-1**

PETER CHAMAS, ESQ., does hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and I am a partner of the Firm and, as such, I am fully familiar with same.
2. To the best of my knowledge, information and belief, there is no other action pending about the subject matter of this complaint in the Superior Court of New Jersey, Law Division, Middlesex County. Additionally, there are no other persons known to me who should be added as parties to this matter, nor are there any other actions contemplated.
3. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

GILL & CHAMAS LLC  
Attorneys for Plaintiff(s)




PETER CHAMAS, ESQ.

Dated: April 30, 2021

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	<b>Civil Case Information Statement</b> <b>(CIS)</b> Use for Initial Law Division Civil Part pleadings (not motions) under <i>Rule</i> 4:5-1 <b>Pleading will be rejected for filing, under <i>Rule</i> 1:6-6(c).</b> <b>If information above the black bar is not completed</b> <b>or attorney's signature is not affixed</b>		Payment type: <input type="checkbox"/> ck <input type="checkbox"/> og <input type="checkbox"/> ca Chg/Ck Number:	
			Amount:	
			Overpayment:	
			Batch Number:	
Attorney/Pro Se Name Peter Chamas, Esq.		Telephone Number (732) 324-7600		County of Venue Middlesex
Firm Name (if applicable) Gill & Chamas, LLC		Docket Number (when available)		
Office Address 655 Florida Grove Road Post Office Box 760 Woodbridge, New Jersey 07095		Document Type Complaint		
		Jury Demand <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Name of Party (e.g., John Doe, Plaintiff) Jorge Martinez and Lisette Martinez, his wife, Plaintiffs		Caption Jorge Martinez, et al v. Safariland, LLC d/b/a Safariland Group, et al		
Case Type Number (See reverse side for listing) 606	Are sexual abuse claims alleged? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is this a professional malpractice case? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If you have checked "Yes," see N.J.S.A. 2A:83A-27 and applicable case law regarding your obligation to file an affidavit of merit.		
Related Cases Pending? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If "Yes," list docket numbers		
Do you anticipate adding any parties (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Name of defendant's primary insurance company (if known) <input type="checkbox"/> None <input type="checkbox"/> Unknown		
The Information Provided on This Form Cannot be Introduced into Evidence				
Case Characteristics for Purposes of Determining If Case is Appropriate for Mediation				
Do parties have a current, past or recurrent relationship? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If "Yes," is that relationship: <input type="checkbox"/> Employer/Employee <input type="checkbox"/> Friend/Neighbor <input type="checkbox"/> Other (explain) <input type="checkbox"/> Familial <input type="checkbox"/> Business		
Does the statute governing this case provide for payment of fees by the losing party? <input type="checkbox"/> Yes <input type="checkbox"/> No				
Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition				
Do you or your client need any disability accommodations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, please identify the requested accommodation:		
Will an interpreter be needed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, for what language?		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with <i>Rule</i> 1:38-7(b).				
Attorney Signature:				

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Side 2



## Civil Case Information Statement (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)

### Track I - 150 days discovery

151	Name Change	506	PIP Coverage
175	Forfeiture	510	UM or UIM Claim (coverage issues only)
302	Tenancy	511	Action on Negotiable Instrument
399	Real Property (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)	512	Lemon Law
502	Bank Account (debt collection matters only)	601	Summary Action
505	Other Insurance Claim (including declaratory judgment actions)	602	Open Public Records Act (summary action)
		999	Other (briefly describe nature of action)

### Track II - 300 days discovery

305	Construction	603Y	Auto Negligence - Personal Injury (verbal threshold)
509	Employment (other than Conscientious Employees Protection Act (CEPA) or Law Against Discrimination (LAD))	605	Personal Injury
599	Contract/Commercial Transaction	610	Auto Negligence - Property Damage
603N	Auto Negligence - Personal Injury (non-verbal threshold)	621	UM or UIM Claim (includes bodily injury)
		699	Tort - Other

### Track III - 450 days discovery

005	Civil Rights	608	Toxic Tort
301	Condemnation	609	Defamation
602	Assault and Battery	610	Whistleblower / Conscientious Employee Protection Act (CEPA) Cases
604	Medical Malpractice	617	Inverse Condemnation
606	Product Liability	618	Law Against Discrimination (LAD) Cases
607	Professional Malpractice		

### Track IV - Active Case Management by Individual Judge / 450 days discovery

156	Environmental/Environmental Coverage Litigation	614	Insurance Fraud
303	Mt. Laurel	620	False Claims Act
508	Complex Commercial	701	Actions in Lieu of Prerogative Writs
613	Complex Construction		

### Multicounty Litigation (Track IV)

271	Accutane/Isotretinoin	801	Asbestos
274	Risperdal/Seroquel/Zyprexa	823	Propecia
281	Bristol-Myers Squibb Environmental	824	Stryker LFF-GoEr-V48 Femoral Heads
282	Fosamax	825	Firefighter Hearing Loss Litigation
285	Stryker Trident Hip Implants	826	Ability
288	Levaquin	827	Physiomesh Flexible Composite Mesh
289	Reglan	828	Taxotere/Docetaxel
291	Pelvic Mesh/Gynecare	829	Zostavax
292	Pelvic Mesh/Bard	830	Proceed Mesh/Patch
293	DePuy ASR Hip Implant Litigation	831	Proton-Pump Inhibitors
295	AlloDerm Regenerative Tissue Matrix	832	HealthPlus Surgery Center
298	Stryker Rejuvenate/ABG II Modular Hip Stem Components	833	Prolene Hernia System Mesh
297	Mirena Contraceptive Device	834	Allergan Biocell Textured Breast Implants
299	Omeprazole Medco/Mylan Medications/Banica		
300	Talc-Based Body Powders		

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 69 ☐ Consumer Fraud

May. 3. 2021 11:58AM

No. 0096 P. 24

MID-L-002596-21 04/30/2021 4:04:30 PM Pg 1 of 2 Trans ID: LCV20211105085

## Civil Case Information Statement

**Case Caption:** MARTINEZ JORGE VS SAFARILAND, LLC  
**D/B/ A SAFARIL**  
**Case Initiation Date:** 04/30/2021  
**Attorney Name:** PETER CHAMAS  
**Firm Name:** GILL & CHAMAS LLC  
**Address:** 665 FLORIDA GROVE RD P.O. BOX 760  
WOODBRIIDGE NJ 07095  
**Phone:** 7323247600  
**Name of Party:** PLAINTIFF : Martinez, Jorge  
**Name of Defendant's Primary Insurance Company**  
(if known): None

**Case Type:** PRODUCT LIABILITY  
**Document Type:** Complaint with Jury Demand  
**Jury Demand:** YES - 6 JURORS  
**Is this a professional malpractice case?** NO  
**Related cases pending:** NO  
**If yes, list docket numbers:**  
**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO  
**Are sexual abuse claims alleged by: Jorge Martinez?** NO  
**Are sexual abuse claims alleged by: Liasette Martinez?** NO

**THIS DOCUMENT IS NOT FOR PUBLIC RELEASE. IT IS NOT TO BE DISCLOSED TO THE PUBLIC OR USED FOR ANY PURPOSE OTHER THAN THE PROCEEDINGS IN THIS CASE.**  
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO

**I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)**

04/30/2021  
**Dated**

/s/ PETER CHAMAS  
**Signed**



May. 3. 2021 11:57AM

No. 0096 P. 13

MIDDLESEX VICINAGE CIVIL DIVISION  
P O BOX 2633  
56 PATERSON STREET  
NEW BRUNSWICK NJ 08903-2633

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 645-4300  
COURT HOURS 8:30 AM - 4:30 PM

DATE: APRIL 30, 2021  
RE: MARTINEZ JORGE VS SAFARILAND, LLC D/B/ A SAFARIL  
DOCKET: MID L -002596 21

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON THOMAS D. MCCLOSKEY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 004  
AT: (732) 645-4300 EXT 88905.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: PETER CHAMAS  
GILL & CHAMAS LLC  
655 FLORIDA GROVE RD  
P.O. BOX 760  
WOODBIDGE NJ 07095

ECOURTS